IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

Intersections Inc. and Net Enforcers, Inc.,

Plaintiffs,

v.

Joseph C. Loomis and Jenni M. Loomis,

Defendants.

Civil Action No. 1:09CV597 (LMB/TCB)

PLAINTIFFS' MOTION FOR SANCTIONS AGAINST DEFENDANT JOSEPH C. LOOMIS DUE TO HIS INTENTIONAL DESTRUCTION OF EVIDENCE

Plaintiffs Intersections Inc. and Net Enforcers, Inc. (collectively, "Plaintiffs"), for the reasons stated in the accompanying Memorandum of Law, respectfully move this Court for entry of an Order (1) granting Plaintiffs a default judgment against Defendant Joseph C. Loomis for all claims asserted by Plaintiffs against him, (2) dismissing Defendant Joseph C. Loomis' counterclaims against Plaintiffs with prejudice, (3) awarding Plaintiffs their attorneys' fees and costs incurred in bringing this Motion, and (4) granting such other and further relief the Court deems proper.

Dated: January 13, 2010 Respectfully submitted,

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of January, 2010, I will electronically file the foregoing Plaintiffs' Motion for Sanctions Against Defendant Joseph C. Loomis Due To His Intentional Destruction of Evidence with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas M. Dunlap, Esquire Email: tdunlap@dglegal.com David Ludwig, Esquire Email: dludwig@dglegal.com Dunlap, Grubb & Weaver P.C. 199 Liberty Street, S.W. Leesburg, Virginia 20175

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/s/

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